IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

JOE ANDREW SALAZAR,

Plaintiff,

v.

AT&T MOBILITY LLC, SPRINT/UNITED MANAGEMENT COMPANY, T-MOBILE USA, INC., AND CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS,

Defendants

and

HTC CORP., and HTC AMERICA, INC.,

Intervenors.

Civil Action No. 2:20-cv-00004-JRG

JURY TRIAL DEMANDED

REVISED JOINT CLAIM CONSTRUCTION CHART PURSUANT TO PATENT RULE 4-5(d)

Pursuant to Patent Rule 4-5(d) and the Court's *sua sponte* Order dated July 21, 2020 (Dkt. No. 107), Plaintiff Joe Andrew Salazar ("Salazar") and Defendants AT&T Mobility LLC, Sprint/United Management Company, T-Mobile USA, Inc., and Cellco Partnership d/b/a Verizon Wireless and Intervenors HTC Corporation and HTC America, Inc. hereby submit this revised Joint Claim Construction Chart. Attached hereto as Exhibit A is the revised Joint Claim Construction Chart that complies with all requirements of P.R. 4-5(d) and addresses the deficiencies identified in the Court's *sua sponte* Order.

Dated: July 22, 2020

Respectfully submitted,

/s/Geoff Culbertson

Kelly Tidwell

TX Bar No. 20020580

kbt@texarkanalaw.com

Geoffrey Culbertson

TX Bar No. 24045732

gpc@texarkanalaw.com

PATTON, TIDWELL & CULBERTSON, LLP

2800 Texas Boulevard Texarkana, Texas 75503 Telephone: 903-792-7080 Telecopier: 903-792-8233

Dariush Keyhani

District of Columbia Bar No. 1031500

Frances H. Stephenson

New York registration No. 5206495

Keyhani LLC

1050 30th Street NW

Washington, DC 20007

T. 202.748.8950

F. 202.318.8958

dkeyhani@keyhanillc.com

fstephenson@keyhanillc.com

Attorneys for Plaintiff

By: /s/F<u>red Williams</u>

Fred I. Williams

Texas State Bar No. 00794855

WILLIAMS SIMONS & LANDIS PLLC

327 Congress Ave., Suite 490

Austin, TX 78701

512.543.1354

fwilliams@wsltrial.com

Todd E. Landis

Texas State Bar No. 24030226

WILLIAMS SIMONS & LANDIS PLLC 2633 McKinney Ave., Suite 130 #366

Dallas, TX 75204

512.543.1354

tlandis@wsltrial.com

John Wittenzellner

Pennsylvania State Bar No. 308996 WILLIAMS SIMONS & LANDIS PLLC 1735 Market Street, Suite A #453 Philadelphia, PA 19103 512.543.1354 johnw@wsltrial.com

Harry Lee Gillam, Jr.
State Bar No. 07921800
gil@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Tel: 003 034 8450

Tel: 903.934.8450 Fax: 903.934.9257

Attorneys for Defendants and Intervenors

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 22^{nd} day of July, 2020, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Fred I. Williams
Fred I. Williams